



MICHAEL P. LOWRY, ESQ.
 Nevada Bar No. 10666
 E-mail: Michael.Lowry@wilsonelser.com
 JONATHAN C. PATTILLO, ESQ.
 Nevada Bar No. 13929
 E-mail: Jonathan.Pattillo@wilsonelser.com
 6689 Las Vegas Boulevard South, Suite 200
 Las Vegas, NV 89119
 Tel: 702.727.1400/Fax: 702.727.1401
 Attorneys for Cardenas Markets, LLC

UNITED STATES DISTRICT COURT

DISTRCIT OF NEVADA

Maria Rivas-Lopez,

Plaintiff,

vs.

Cardenas Markets, LLC, a foreign limited liability company; Does I through X, inclusive and Roe Business Entities I though X, inclusive,

Defendants.

Case No.: 2:24-cv-1221-JAD-DJA

Stipulation and Order to Continue Discovery Deadlines

(Third Request)

I. Discovery Completed To Date

- a. Plaintiff has made his initial disclosure of witnesses and documents;
- b. Defendant has made its initial disclosure of witnesses and documents;
- c. Defendant propounded written discovery to Plaintiff (Plaintiff responded);
- d. Plaintiff propounded written discovery to Defendant (Defendant responded);

II. Discovery Left To Be Completed

- a. Deposition of Plaintiff;
- b. Deposition of 30(b)(6) Representative;
- c. Disclosure of Experts;
- d. Deposition of Expert witnesses;
- e. Other discovery as needed.

1 **III. Reasons For Extension**

2 Plaintiff provided 30(b)(6) topics to Defendant. Defendant objected to three topics and filed
3 a motion for protective order on the matter (ECF No. 15). This matter is fully briefed and pending
4 for a hearing on December 30. The 30(b)(6) testimony may affect expert witness opinions, and thus
5 the parties would like a short extension in order to get a ruling on this matter, depose Defendant's
6 30(b)(6) witness and provide the testimony to their experts.

7 **IV. Proposed Deadlines**

8 **CURRENT SCHEDULE TO COMPLETE REMAINING DISCOVERY:**

Motions to Amend or Add Parties:	CLOSED
Initial Expert Disclosures:	01/03/2025
Rebuttal Expert Disclosure:	02/03/2025
Close of Discovery:	03/03/2025
Dispositive Motion Deadline:	04/04/2025
Joint Pre-Trial Order	05/05/2025

15 **PROPOSED SCHEDULE FOR COMPLETING DISCOVERY**

Motions to Amend or Add Parties:	CLOSED
Initial Expert Disclosures:	03/03/2025
Rebuttal Expert Disclosure:	04/02/2025
Close of Discovery:	05/02/2025
Dispositive Motion Deadline:	06/02/2025
Joint Pre-Trial Order	07/02/2025

DATED this 13th day of December, 2024.



DATED this 13th day of December, 2024.

LADAH LAW FIRM

/s/ Jonathan C. Pattillo, Esq.

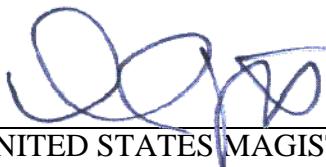
Michael P. Lowry, Esq.
Nevada Bar No. 10666
Jonathan C. Pattillo, Esq.
Nevada Bar No. 13929
Attorneys for Cardenas Markets, LLC

/s/ Adrian Karimi, Esq.

Ramzy Paul Lada, Esq.
Nevada Bar No. 11405
Adrian Karimi, Esq.
Nevada Bar No. 13514
Attorneys for Maria Rivas-Lopez

IT IS SO ORDERED.

DATED: 12/16/2024



UNITED STATES MAGISTRATE JUDGE

A handwritten signature in blue ink, appearing to read "Adrian Karimi", is placed over a horizontal line. Below the line, the text "UNITED STATES MAGISTRATE JUDGE" is printed in capital letters.

From: Adrian Karimi <Adrian@ladahlaw.com>
Date: December 13, 2024 at 12:32:29 PM PST
To: "Pattillo, Jonathan C." <Jonathan.Pattillo@wilsonelser.com>, Julie Roberts <julier@ladahlaw.com>
Subject: RE: Maria Rivas-Lopez v. Cardenas; Case No. 2:24-cv-01221-JAD-DJA

EXTERNAL EMAIL This email originated from outside the organization.

Yes you may attach my signature

From: Pattillo, Jonathan C. <Jonathan.Pattillo@wilsonelser.com>
Sent: Wednesday, December 11, 2024 4:11 PM
To: Julie Roberts <julier@ladahlaw.com>
Cc: Adrian Karimi <Adrian@ladahlaw.com>
Subject: RE: Maria Rivas-Lopez v. Cardenas; Case No. 2:24-cv-01221-JAD-DJA

Please see attached. Waiting on a 30b6 ruling was my reasoning.

Jonathan C. Pattillo
Attorney at Law
Wilson Elser Moskowitz Edelman & Dicker LLP
6689 Las Vegas Blvd. South, Suite 200
Las Vegas, NV 89119
702.727.1268 (Direct)
702.727.1400 (Main)
702.727.1401 (Fax)
jonathan.pattillo@wilsonelser.com

From: Julie Roberts <julier@ladahlaw.com>
Sent: Wednesday, December 11, 2024 3:40 PM
To: Pattillo, Jonathan C. <Jonathan.Pattillo@wilsonelser.com>
Cc: Adrian Karimi <Adrian@ladahlaw.com>
Subject: RE: Maria Rivas-Lopez v. Cardenas; Case No. 2:24-cv-01221-JAD-DJA

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